

IDAHO DEPARTMENT  
OF HEALTH AND WELFAREDIVISION OF  
ENVIRONMENTAL QUALITY

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To	Tim Brincefield	From	G. Brown
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Philip E. Bitt, Governor

December 21, 1995

Tim Brincefield  
US EPA Region 10  
1200 Sixth Ave.  
Seattle, Wa. 98101

Regarding: State of Idaho comments on the Monsanto Phase III Feasibility Study.

Dear Mr. Brincefield:

The concerns of the State center on issues that have already been raised and were presented in the EPA comments to the Phase II Feasibility Study. Unfortunately some of those issues still appear to be unresolved. Please consider the following comments on the Monsanto Phase III Feasibility Study:

**Revised Response to Technical Review Comments-Monsanto Phase II, December 4, 1995:**

In comment #7 the EPA reminds Monsanto that Phase II should describe which/how alternatives would reduce risks to workers as well as migration to off-site soils. Monsanto objected to the thrust of this comment. Implications related to OSHA and CERCLA authority are at issue. Does the EPA Region 10 now have a clear policy on how CERCLA and OSHA problems will interface? Please respond to the State so that we may understand that position.

The State supports the EPA position presented in comment #8. It is reasonable to ask for monitoring that would confirm the effectiveness of the source control measures being proposed by Monsanto. Monsanto's position is not responsive. Some air monitoring should be performed.

Comment #12 has not been addressed by the PRP. We could see no language in the text that reflects the concern set forth in the comment. Monsanto still needs to acknowledge that there are constituents in their non-contact cooling water that are extracted via the production well from contaminated groundwater that ultimately ends up in the Soda Creek drainage.

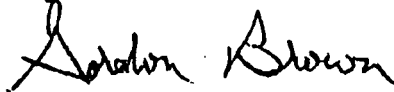
In conjunction with comment #12 we respectfully request that the EPA require a sampling regime for the Soda Creek drainage. The monitoring should include samples of the effluent before it is discharged into the creek bi-annually at a minimum. The "flat" area (slack area of the stream), where constituents have been identified to accumulate, should be monitored to assure that concentrations are not building up. The surface water component from the Mormon and Calf Spring complexes should be monitored as well. The number of samples to be collected should be established. Whatever that number ends up being, it should be statistically defensible. We



anticipate that Monsanto will want a clear idea as to what additional contamination would be considered actionable.

As always, should you have questions or wish further clarification, don't hesitate to call. Please note that there is one item in the body of the text above which will impact other sites in Southeastern Idaho and we wish to resolve and secure a position statement from the EPA. If you wish to discuss this in advance of issuing a statement we would be happy to do so.

Regards



Gordon Brown  
Remediation Project Officer

gb

cc: Mike Thomas  
Boyd Roberts